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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matter of Amendment of Section 73.202(b), Table of Allotments FM Broadcast Stations (Shorter, Alabama))	MM Docket No. 04-201
)	RM-10972
То:	Chief, Allocations Branch Policy and Rules Division		

REPLY COMMENTS TO PROPOSED RULE MAKING AND TO COUNTER PROPOSAL

These reply comments are filed in further support of the Notice of Proposed Rule Making, MB Docket No. 04-201, RM-10972, by SSR Communications Incorporated ("SSR") and in opposition to the counter proposal subsequently filed by Scott Communications, Inc. ("Scott") and the Alexander Broadcasting Company ("Alexander").

BACKGROUND

Media Bureau

In the initial petition for rulemaking, SSR asked the Commission to allot FM Channel 300A to the community of Shorter, Alabama, as that community's *first local broadcast service*. Scott and Alexander jointly filed a counterproposal to the initial petition, which requested that the Commission modify the license of WJAM-FM on FM Channel 300A at Orrville, Alabama to specify Shorter as its new city of license and upgrade that station's facilities to FM Channel 300C3 at Shorter. Concurrently, station WALX proposed to modify its reference coordinates and its city of license to Orrville to

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replace the proposed deleted FM service. SSR was not served with any other comments regarding the matter, nor did it appear as if the Commission were either.

DISCUSSION

SSR maintains that its initial petition for rulemaking is preferred as it pertains to the Commission's allotment priority process. SSR also states that its petition would be a better and more efficient use of the FM Table of Allotments. If the Commission finds that the Scott and Alexander counter proposal is technically acceptable, then SSR looks forward to replying to the Public Notice that the Commission will issue on the matter. At that time, SSR will further support its position.

FURTHER EXPRESSION OF INTEREST

SSR reiterates its interest in this matter and states that it intends to file an application for the facility and build it out promptly. SSR respectfully requests that the Commission adopt SSR's proposal to add FM Channel 300A at Shorter, Alabama.

Date: August 2, 2004

SSR Communications, Inc. 5270 West Jones Bridge Road Norcross, GA 30092-1628 (601) 201-2789

Respectfully Submitted,

Matthew K. Wesolowski

General Manager

CERTIFICATION

I certify that I have directly prepared or supervised the preparation of this entire document. I believe it to be accurate and true, to the best of my knowledge. I have also sent copies of this document, by overnight Postal Service Express Mail, to the following persons:

Mark N. Lipp Scott Woodworth Vinson & Elkins, LLP 1455 Pennsylvania Avenue, NW Suite 600 Washington, DC 20004-1008 (Legal counsel for Scott and Alexander)

Rolanda Smith Media Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554

Date: August 2, 2004

SSR Communications, Inc. 5270 West Jones Bridge Road Norcross, GA 30092-1628 (601) 201-2789

Respectfully Submitted

Matthew K. Wesolowski

General Manager